



February 3, 2005

**By Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, D.C. 20554

Re: **EX PARTE**  
IB Docket No. 01-185

Dear Ms. Dortch:

On February 2, 2005, the undersigned, representing ICO Global Communications (Holdings) Ltd. ("ICO"), spoke by phone with Sam Feder, legal advisor to Commissioner Kevin Martin, on matters related to the above-referenced docket.

ICO emphasized that each of the mobile satellite services ("MSS") systems, whether L-band, Big LEO or 2 GHz, operates in a unique spectrum use and interference environment, and that the Commission should take account of relevant distinctions between these services in reviewing petitions for reconsideration in the instant proceeding.

ICO also noted that specific proceedings to consider applications for an ancillary terrestrial component ("ATC"), rather than the instant reconsideration proceeding, are the most appropriate vehicles for assessing or imposing detailed technical parameters of ATC deployment by a specific MSS licensee. Conversely, it would be inappropriate to impose detailed and specific restrictions on MSS system operations related to ATC implementation outside the context of an MSS licensee's ATC application.

ICO noted that Commission rules require that each ATC application be placed on public notice. This public notice and comment period provides ample opportunity for detailed review and consideration of an MSS licensee's compliance with the Commission's rules, in the context of the particular and unique characteristics of the licensee's MSS system.

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In accordance with section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed.

Very truly yours,

/s/ Suzanne Hutchings Malloy

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Suzanne Hutchings Malloy

cc: S. Feder